

Tod S. Chasin  
BUCHANAN INGERSOLL & ROONEY PC  
700 Alexander Park, Suite 300  
Princeton, NJ 08540  
Phone: (609) 987-6802  
Fax: (609) 520-0360

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

HUTZLER MANUFACTURING COMPANY, INC.	)	
	)	
Plaintiff,	)	
v.	)	
	)	1:11-cv-07211-PGG
BRADSHAW INTERNATIONAL, INC.	)	
	)	
Defendant.	)	
	)	
	)	

**NOTICE OF MOTION FOR RECONSIDERATION OF THE COURT'S  
MEMORANDUM OPINION AND ORDER GRANTING HUTZLER  
MANUFACTURING CO., INC.'S MOTION FOR A PRELIMINARY INJUNCTION**

PLEASE TAKE NOTICE that pursuant to Local Rules 6.1 and 6.3, upon the accompanying Memorandum of Law in Support of the Motion for Reconsideration, and the exhibits thereto, Defendant Bradshaw International, Inc. ("Bradshaw"), through its attorneys, will move this Court, before the Honorable Paul G. Gardephe, for reconsideration of the Court's Memorandum Opinion and Order of July 25, 2012, granting Hutzler Manufacturing Co., Inc.'s ("Hutzler") Motion for a preliminary injunction. [D.I. 24.] A memorandum in support of Bradshaw's motion for reconsideration of court is submitted herewith.

Dated: August 8, 2012

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

/s/Tod S. Chasin

Tod S. Chasin, Esq.

BUCHANAN INGERSOLL & ROONEY PC

700 Alexander Park, Suite 300

Princeton, NJ 08540

Phone: (609) 987-6802

Fax: (609) 520-0360

*tod.chasin@bipc.com*

OF COUNSEL:

Robert J. Kenney

Michael B. Marion

BIRCH, STEWART, KOLASCH & BIRCH, LLP

8110 Gatehouse Road, Suite 100E

Falls Church, VA 22042

Phone: (703) 205-8000

Fax: (703) 205-8050

*mailroom@bskb.com; RJK@bskb.com*

**ATTORNEYS FOR DEFENDANT  
BRADSHAW INTERNATIONAL, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 8th day of August, 2012, I electronically transmitted the foregoing document to the Clerk of Court using the ECF system for filing and transmittal of a Notice of Electronic Filing upon counsel for the plaintiff as follows:

Michael Robert Graif  
Chadbourn & Parke, LLP  
30 Rockefeller Plaza  
New York, NY 10112  
[mrgraif@curtis.com](mailto:mrgraif@curtis.com)

Turner Pearce Smith  
Curtis, Mallet-Prevost, Colt and Mosle LLP  
101 Park Avenue South 35<sup>th</sup> Floor  
New York, NY 10178  
[tsmith@cm-p.com](mailto:tsmith@cm-p.com)

/s/Tod S. Chasin  
Tod S. Chasin, Esq.